

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ADAM PERRY, on Behalf of Himself and All
Others Similarly Situated,

Plaintiff,

v.

WELLS FARGO & COMPANY, CHARLES W.
SCHARF, TIMOTHY J. SLOAN, and JOHN R.
SHREWSBERRY,

Defendants.

Case No. 1:20-CV-04494 (GHW)

**NOTICE OF MOTION OF THE INSTITUTIONAL INVESTORS
FOR APPOINTMENT AS LEAD PLAINTIFF AND
APPROVAL OF THEIR SELECTION OF LEAD COUNSEL**

PLEASE TAKE NOTICE that, on a date and at a time designated by the Court, before the Honorable Gregory H. Woods, at the United States District Court for the Southern District of New York, Daniel Patrick Moynihan United States Courthouse, located at 500 Pearl Street, New York, New York, Handelsbanken Fonder AB, Public Employees' Retirement System of Mississippi, State of Rhode Island, Office of the General Treasurer, on behalf of the Employees' Retirement System of Rhode Island, and the Louisiana Sheriffs' Pension & Relief Fund (collectively, the "Institutional Investors") will respectfully move this Court, pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), for entry of an Order: (i) appointing the Institutional Investors as Lead Plaintiff on behalf of themselves and all persons or entities that purchased or otherwise acquired Wells Fargo & Company ("Wells Fargo") common stock between February 2, 2018 and March 10, 2020, both dates inclusive (the "Class Period"); (ii) approving the Institutional Investors' selection of Bernstein Litowitz Berger & Grossmann LLP ("Bernstein Litowitz") and Cohen Milstein Sellers & Toll PLLC ("Cohen Milstein") as Lead Counsel for the proposed Class; and (iii) granting such other and further relief as the Court may deem just and proper. This Motion is made on the grounds that the Institutional Investors believe they are the "most adequate plaintiff" under the PSLRA and should therefore be appointed Lead Plaintiff. Specifically, the Institutional Investors believe that they have the "largest financial interest" in the relief sought by the Class in this Action by virtue of, among other things, the approximately \$39.7 million in losses that they incurred on their purchases of 2,284,583 shares of Wells Fargo stock during the Class Period. The Institutional Investors also believe that they otherwise satisfy the requirements of Rule 23 of the Federal Rules of Civil Procedure because their claims are typical of other Class members' claims and because they will fairly and adequately represent the interests

of the Class. The Institutional Investors are a paradigmatic Lead Plaintiff under the PSLRA because they are sophisticated institutional investors with a substantial financial interest in the litigation and the proven ability to supervise and monitor counsel.

This Motion is supported by the accompanying Memorandum of Law, the Declaration of Hannah Ross and the exhibits annexed thereto, the prior pleadings and other filings herein, and such other written or oral argument as may be permitted by the Court.

WHEREFORE, the Institutional Investors respectfully request that the Court enter an Order: (i) appointing them as Lead Plaintiff; (ii) approving their selection of Bernstein Litowitz and Cohen Milstein as Lead Counsel for the proposed Class; and (iii) granting such other and further relief as the Court may deem just and proper.

Dated: August 14, 2020

/s/ Hannah Ross

**COHEN MILSTEIN SELLERS & TOLL
PLLC**

Steven J. Toll
S. Douglas Bunch (SB-3028)
Molly J. Bowen
1100 New York Avenue, N.W., Suite 500
Washington, DC 20005
Telephone: (202) 408-4600
Facsimile: (202) 408-4699
stoll@cohenmilstein.com
dbunch@cohenmilstein.com
mbowen@cohenmilstein.com

Laura H. Posner (LP-8612)
88 Pine Street, Fourteenth Floor
New York, NY 10005
Telephone: (212) 220-2925
Facsimile: (212) 838-7745
lposner@cohenmilstein.com

*Counsel for Proposed Lead Plaintiff
Mississippi and Rhode Island, and Proposed
Lead Counsel for the Class*

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

Hannah Ross
Jeroen van Kwawegen
Avi Josefson
1251 Avenue of the Americas
New York, NY 10020
Telephone: (212) 554-1400
Facsimile: (212) 554-1444
hannah@blbglaw.com
jeroen@blbglaw.com
avi@blbglaw.com

*Counsel for Proposed Lead Plaintiff Handelsbanken
and Louisiana Sheriffs, and Proposed Lead Counsel
for the Class*